



November 15, 2017

Environmental Protection Agency  
Attn: Jerry Minor-Gordon  
5 Post Office Square  
Boston, Massachusetts 02109-3912  
617.918.1312

Dear Mr. Jerry Minor-Gordon,

The Naugatuck Valley Council of Governments is requesting a FY 2018 Revolving Loan Fund to address an immediate need for remediation funding in our region. The NVCOG is applying for a new RLF because we are aware our original FY 2005 Revolving Loan Fund is fully committed and will have to begin closeout.

The NVCOG's proven process has identified priority sites for remediation year after year. New requests come in frequently and are reviewed expeditiously by staff. We are dedicated to equitable and sustainable redevelopment with a focus on mixed-use development including affordable housing and niche manufacturing. Together with our community partners through the Regional Brownfields Partnership, the Naugatuck Valley Council of Governments will continue to complete successful projects that help improve water quality and community health while creating jobs.

We are committed to fulfilling the statutory cost share and expect to be able to leverage significant private financing. This program is critical to the economic vitality of our region. Our region has been fortunate to have access to an EPA Revolving Loan Fund in the past. We still have hundreds of sites to resolve and we look forward to doing the work.

Thank you for your continued support and consideration.

Sincerely,

Rick Dunn | Executive Director

Information Pertaining to this Package:

**a. Applicant Identification:**

Naugatuck Valley Council of Governments (NVCOG)  
49 Leavenworth St. Third Floor, Waterbury, CT 06702

**b. Funding Requested**

i) Grant type: RLF

ii) Federal Funds Requested: \$1,000,000. No cost-share waiver requested.

iii) Contamination: \$500,000 hazardous substances, \$500,000 petroleum.

**c. Location:** The target community is within the City of Waterbury. The 27 municipalities eligible for assessment funding through the Regional Brownfields Partnership (an affiliation of municipalities and community organizations) include: Ansonia, Beacon Falls, Berlin, Bethlehem, Bristol, Burlington, Cheshire, Derby, Middlebury, Naugatuck, New Britain, Newtown, Oxford, Plainville, Plymouth, Prospect, Seymour, Shelton, Southbury, Southington, Thomaston, Torrington, Waterbury, Watertown, Winchester, Wolcott, and Woodbury.

**d. Contacts**

i. **Project Director:** Arthur Bogen, phone 203.757.0535; fax 203.735.8680; [abogen@valleycog.org](mailto:abogen@valleycog.org); Naugatuck Valley Council of Governments, 49 Leavenworth St., Waterbury, CT 06702

ii. **Chief Executive Officer:** Rick Dunne, Executive Director, phone 203.757.0535; fax 203.735.8680; [rdunne@valleycog.org](mailto:rdunne@valleycog.org); Naugatuck Valley Council of Governments, 49 Leavenworth St., Waterbury, CT 06702

**e. Population:** Region: 687,000; Target Area: 12,919

**j. Other Factors Checklist:** Attached (Attachment A)

**g. Letter from State of Tribal Environmental Authority:** Attached (Attachment B)

### Appendix 3

#### F Other Factors Checklist

Name of Applicant: Naugatuck Valley Council of Governments

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	Pg. 2
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	Attachments D and E Project Commitments
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

October 30, 2017

Mr. Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth St., 3<sup>rd</sup> floor  
Waterbury, CT 06702

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 18

Dear Mr. Dunne:

The Connecticut Department of Energy and Environmental Protection acknowledges that the Naugatuck Valley Council of Government intends to apply for a US EPA brownfields grant to establish a revolving loan fund and conduct cleanup activities.

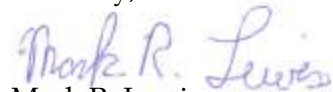
Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including among others the Voluntary Remediation program pursuant to CGS § 22a-133x, the Property Transfer Program, (if applicable) pursuant to CGS §22a-134, the Urban Sites Remedial Action Program pursuant to CGS §22a-133m, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on our web site at

[http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav\\_GID=1626](http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav_GID=1626).

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at [mark.lewis@ct.gov](mailto:mark.lewis@ct.gov). Good luck with your application.

Sincerely,



Mark R. Lewis  
Brownfields Coordinator  
Office of Constituent Affairs & Land Management

c: Ms. Dorrie Paar, EPA (via e- mail)  
Mr. Max Tanguay- Colucci, NVCOG (via e- mail)

## NARRATIVE PROPOSAL

### Overview

NVCOG currently maintains a fully obligated FY 2005 Revolving Loan Fund. The FY 2018 revolving loan fund, if awarded, will be made available to eligible entities within the Regional Brownfields Partnership 27 municipality service region.

### COMMUNITY NEED

#### a. **Target Area and Brownfields**

##### i. Community and Target Area Descriptions

Home to over 685,000 residents, west-central Connecticut is populated by small towns and cities scattered among hills, streams, and valleys. The communities that NVCOG's brownfields programs serve make up nearly one-third of the state's distressed municipalities as determined by the state Department of Economic and Community Development in 2017. Our communities are disproportionately burdened by brownfields. Greenfields available for development are severely limited due to steep, hilly topography and industrial development that lines rivers and streams. There are few opportunities for increasing tax revenue beyond brownfields. There are five superfund sites and hundreds of vacant or abandoned sites. The region continues to be post-industrial in character, not having yet fully recovered from the national decline of large-scale manufacturing. The secondary real estate market has not benefited from significant private investment as seen in other parts of the Boston-Washington corridor. Our municipalities do not have the resources to remediate brownfield sites without the aid of this revolving loan fund.

The Naugatuck Valley in particular once hosted giants of the timepiece and metals industries, including Chase Brass and Copper Company and Timex. Today, the former industrial campuses still standing are heavily contaminated. Some of the worst of these sites are surrounded by dense residential neighborhoods. Those with the least among us are often pushed to these affordable but often plagued urban fringes, dominated by decaying vacant buildings and the noxious mix of soils beneath. One such area is the target community, consisting of the City of Waterbury's North End, downtown, South End, and Brooklyn neighborhoods. These neighborhoods are in close proximity to downtown, together making up the densest urban cluster in the region. In addition to being home to some of the largest black and Hispanic communities in the region, the area has the highest density of brownfields according to the NVCOG Brownfield Inventory.

##### ii. Demographic Information and Indicators of Need

	Target Area	Waterbury	Region	State	National
<b>Population<sup>1</sup></b>	12,919	110,074	687,000	3,593,222	316,127,513
<b>Unemployment (%)</b>	9.7 (Tract 3502)	8.5	-	5.9	8.3

<b>Poverty rate (%)<sup>1</sup></b>	41.7 (Tract 3502)	25.1	-	10.5	15.5
<b>Minority (%)<sup>1</sup></b>	91.5 (Tract 3502)	59.4	-	30.8	37.8
<b>Household median income (\$)¹</b>	21,744 (Tract 3502)	40,467	-	70,331	53,889
<sup>1</sup> Data are from the 2011-2015 American Community Survey and are available on American FactFinder					

The Waterbury target area consists of three census tracts – tracts 3502, 3501, and 3505. More than 80% are minority and live in aging housing adjacent to over 100 acres of abandoned vacant industrial buildings. Vacancy and abandonment are exacerbated by the high cost of living in the state. According to the 2016 United Way study of Asset Limited, Income Constrained, Employed People in our Region, the percentage of households paying more than 30% of income for housing was 63% in Waterbury. Even with Connecticut’s higher than national average median income, half of all renters and more than one third of all homeowners are housing burdened. Very low median household incomes in the target area are detrimental to neighborhood health and wellness.

The EPA EJ Screen Tool indicates that Waterbury, Connecticut has more high priority (95-100 percentile) environmental justice communities in close proximity to National Priority List sites than any other New England city with over 100,000 residents, with a total 27 EJ census block groups that meet the criteria. Waterbury therefore has more exceptionally vulnerable people living near National Priority Sites than in any other small city in New England.

### iii. Description of Brownfields

The largest and most significant brownfield site in need of remediation funding is the Anamet site in Waterbury at 695 South Main Street. The property is located within Waterbury’s South End in close proximity to the Waterbury Metro North Train Station, which provides daily service to Bridgeport, Stamford, and Grand Central Station, New York City. The South End is a primarily black and Hispanic neighborhood, punctuated by small businesses and dense housing. The area is dominated by vacant and underutilized buildings of years past. The Anamet property abuts the Naugatuck River and is a critical part of the City’s visions for the planned Naugatuck River Greenway in Waterbury. When complete, the Naugatuck River Greenway will extend 44 miles through eleven cities and towns along the Naugatuck River. The existing structures at the Anamet site are grouped along the riverfront and tightly packed along South Main Street, a narrow, dense corridor connecting the South End to downtown. Environmental impacts include PAHs, solvents, metals, oils and VOCs from past metal manufacturing and foundry operations. The majority of sites targeted have a similar story given the area’s history of intensive metals operations.

## b. **Welfare, Environmental, and Public Health Impacts**

### i. Welfare Impacts

There are more than 100 acres of closed metal manufacturing and foundry sites dominating the low-income, high density Waterbury target area. The South End, downtown, and Brooklyn neighborhoods are adjacent to the I-84 viaduct and Connecticut Rt. 8. I-84 and Rt. 8 are elevated, six lane expressways as tall as 90 feet above ground level that contribute to degraded air quality and limited neighborhood connections below. Although shopping centers and community amenities are located within close walking distance to many within these neighborhoods, wide road widths, incomplete sidewalks, and fast driving speeds associated with the nearby highway off-ramps make walking largely unpleasant and unsafe. The area is served by public transit, but waiting times exceed one half hour and schedules are often unreliable due to maintenance issues. Most residential structures in the target neighborhoods were built in the early twentieth century and to date, few have had significant renovation. Lead and asbestos materials are widespread. The abandoned industrial buildings still standing are over four stories tall, structurally unsound, full of standing water and debris, and are magnets for crime and unsafe habitation. Vacancy attracts rogue dumping despite energetic efforts by the City's Blight Force.

ii. Cumulative Environmental Issues

The CT Department of Energy and Environmental Protection maintains a "List of Contaminated or Potentially Contaminated Sites". There are over 250 records in the target municipality alone. While the full environmental impact is difficult to measure at a regional level, we see site specific impacts every day. Leaking storage tanks hide beneath sites adjacent to our water supplies and decaying structures are leaving toxic heavy metals and asbestos in our soils. Despite all we are doing to minimize impact, our efforts are not enough to ensure closure of all potential pathways to exposure and to prevent dangerous fires with risk to first responders and neighbors.

Connecticut Rt. 8 is a divided highway running north to south through all our communities with traffic counts up to 117,000 on I-84 near Route 8 in our target Waterbury area. Rush hour traffic is often backed up for miles, leaving diesel emissions below. Past assessments have documented widespread urban fill including ash and slag to fill areas along the river for industrial, commercial and residential development. Additional concentrations of metals, oils, and VOCs have been found to depths of 15 feet. The prevailing winds carry lead to small garden plots where it joins arsenic and other constituents of concern. The sum of the impacts is that there is almost no place of ecological refuge in this brownfield corridor.

iii. Cumulative Public Health Impacts

Health Concerns: Naugatuck Valley Health District 2013-2016 Community Needs Assessment

<b>Chronic lower respiratory disease</b>	Highest in state with 37.2% affected
<b>Lung cancer rates</b>	Highest in state
<b>Childhood asthma</b>	21% versus 13.4% nationally
<b>Suicide rate</b>	Highest in state

The Naugatuck Valley has predominant wind patterns that have caused the intense distribution of metals and PAHs in the neighborhoods along the river and streams. This impact was defined by the urban agriculture non-profit Brass City Harvest when they sampled multiple sites to establish vegetable gardens. Previous assessments conducted by NVCOG confirm the widespread presence of contaminants throughout the region. The target community has a high concentration of vulnerable populations, including young, single parent families with young children and impoverished individuals over the age of 65. Statistics indicative of the impact on health show that visits to the emergency rooms by children with asthma averaged 61.3 per 10,000 people in the state but were 197.3 in Waterbury according to the Waterbury Regional Health study.

The rate of Hispanic infant deaths was 10.4 per 1,000 compared to 7.1 statewide. Black and Hispanic populations make-up over 86% of the population in the densest census tracts in Waterbury. The median age of the housing stock in Waterbury is 1957 – one of the oldest in the region according to the Connecticut Economic Resource Center. Widespread poverty limits access to housing other than the old, substandard and blighted units in brownfield burdened neighborhoods. Friable asbestos, VOCs and dust from dirt laden with metals present unacceptable exposures. These communities are disproportionately burdened by toxic conditions.

The Naugatuck Valley as a whole has a significantly higher rate of invasive cancers when compared to cities over 100,000 in the state (Community Health Profile 2009-2010, Yale-Griffin Prevention Research Center). The rate of all cancers per 100,000 people in the Naugatuck Valley was 1.4 times the rate in Bridgeport, 1.9 times the rate in Hartford, and 1.4 times the rate in New Haven. These health outcomes may be connected to risks at brownfields sites. This is echoed in the disproportional devastation Naugatuck Valley communities have experienced as a result of the national opioid crisis. According to the New Haven Register, 257 people died in Connecticut from heroin overdoses in 2013. 117 of those deaths occurred in the service area of the [Naugatuck] Valley Substance Abuse Action Council, over 45% of the total in just eleven Connecticut communities. This may be related in part to the rampant unemployment and underemployment that widespread vacant and underutilized properties beget.

**c. Financial Need**

**i. Economic Conditions**

This grant is our sole source for community-wide environmental remediation funding. The Naugatuck Valley Council of Governments is a regional council of governments. There is no county government in Connecticut. Unlike county government, councils of governments in Connecticut are voluntary associations without taxing authority. NVCOG's current Revolving Loan Fund, awarded in 2005, is fully obligated. Municipalities are struggling to meet the volatile budget conditions caused by the Connecticut state fiscal crisis. While the legislature passed a budget as of October 26, 2017, there are already projected shortfalls in the hundreds of millions. State brownfields funding is vulnerable. Our communities need the capacity of this program.



Most of the municipalities that NVCOG serves are faced with budget challenges partially due to limited tax bases and under used brownfield sites that do not generate revenue. We are small, low-income, disinvested, and secondary market communities. During the 2007 recession, the region experienced sharper job losses than the state and nation as a whole. From 2007 to 2011, 12,337 jobs were lost, a decline of 7.6% (CT Department of Labor). While the state recovered 87.8% of the jobs lost during the recession, our region has regained only 41.8%. Residents have been hit hard by the widespread loss of metro-area job opportunities across Connecticut, including those widely publicized nationwide such as the loss of 100 jobs at GE's former headquarters in nearby Fairfield in 2016, the loss of 100 jobs at Aetna's headquarters in Hartford in 2017, the unknown number of job losses expected at Lego's headquarters in Enfield in 2017, the loss of 200 jobs at ESPN's headquarters in Bristol in 2015 and an additional loss of 150 jobs expected 2017, the loss of 125 jobs at Sikorsky in 2015, the loss of 400 jobs at Alexion Pharmaceuticals in New Haven, and the loss of 400 jobs at Bristol-Myers Squibb's shuttered Wallingford research facility in 2015.

ii. Economic Effects of Brownfields

While representing only 15% of the state's land area, the region is home to seven environmental justice communities and 8 of 25 of the most distressed municipalities in the state according to the Connecticut Department of Economic and Community Development. Today, dozens of significant brownfield clusters are left vacant and underutilized within historic neighborhood centers. The exodus of large-scale manufacturing began in the 1930s and slowly fell away after World War II. Decline was fast tracked by the catastrophic Flood of 1955, which destroyed entire neighborhoods and forced many remaining employers to leave the area.

While the manufacturing remains an important of the economy the service and health sectors dominate. As in many areas, these sectors have not kept up with job and income needs. The poverty rate in the target area is nearly 5 times the state rate (ACS 2015 5 year estimates). According to the Connecticut Department of Labor, Waterbury has the second highest unemployment rate in the state. The disproportionate predominance of brownfields holds back income and job growth.

The depressed economic activity associated with brownfield sites is not only evident in the reduced tax base, it is also showing up in the troublesome tax collection rates (below 90% for one of our municipalities) and real dollars not available to our towns and state. The 10/1/14 report by the CT Department of Revenue Services shows that in our region, 9 of the top 50 business delinquencies owe \$1,753,029 to the state. The delinquent municipal taxes owed exceeds \$40,000,000.

Waterbury has instituted an assertive blight management program but deals with constant property abandonment and rogue dumping. It is challenging for municipalities to put their best economic foot forward when brownfields and blight are so prevalent. These vacant sites create a burden on our police departments as well as fire services. Home ownership in the target areas hovers at less than 30% according to the United Way survey. We need funding to rebuild wealth and wellness.

2. **PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

a. **Program Description and Marketing Strategy**

i. Program Description:

The Naugatuck Valley Council of Governments (NVCOG) has successfully maintained and utilized an EPA Revolving Loan Fund since 2005. While previous loans revolve, a new EPA Brownfield Revolving Loan Fund grant will allow NVCOG to continue offering loans and grants as part of our comprehensive brownfields services serving the 27 eligible municipalities of the Regional Brownfields Partnership. The Regional Brownfields Partnership is an affiliation separate from the Council that guides our brownfields projects and is our major partner in this grant application. NVCOG is able to put these funds to good use immediately and effectively.

NVCOG will build on and reassess its existing RLF procedures with EPA to meet the requirements of a FY 2018 RLF. Oversight of the program is currently led by five key NVCOG staff. Loan and grant making authority is vested in the NVCOG Revolving Loan Fund Committee. The Revolving Loan Fund Committee is made up of five chief elected officials from the region each with first-hand experience in brownfield redevelopment. Prior to issuing loans or grants to an eligible entity, the Committee reviews an expansive set of materials including bank underwriting, pro-formas, property appraisals, outside loan commitment letters and terms, current tax information, revenue projections, prior grant history, and more. Corporation Counsel and a representative from our partner bank are involved throughout the process to advise financial and legal matters.

NVCOG staff work closely with municipal staff, the Connecticut Department of Energy and Environmental Protection, our EPA Project Officer, and Corporation Counsel to ensure projects benefit the areas proposed for redevelopment by reviewing projects based on various criteria including but not limited to: location within a targeted area, access to existing transportation facilities, proposed community amenities, existing utility infrastructure, developer's past experience with brownfield sites, market feasibility studies, and alignment with the municipality's Plan of Conservation and Development. NVCOG staff provide consistent and effective oversight, maintaining ACRES, reporting to EPA quarterly, and reporting to EPA annually with Minority/Women Owned-Business reports. NVCOG's team is capable of conducting Davis Bacon interviews and overseeing production of EPA requirements including Quality Assurance Project Plans, Analyses of Brownfield Clean-up Alternatives, and Community Relations Plans.

NVCOG is committed to maintaining its current Revolving Loan Fund through closure and will be equally as committed to a FY 2018 Revolving Loan Fund. Proper maintenance is ensured through institutional capacity, which NVCOG has worked hard to build each and every day and has proven with its successful management of EPA funds carried through past staff changes.

ii. Marketing Strategy:

The NVCOG Revolving Loan Fund is well known to economic development professionals, developers, community organizations, chief elected officials, and real estate agents throughout our region. Through public outreach conducted by the Regional Brownfields Partnership, NVCOG

will continue to meet with stakeholders, municipal staff, community organizations, and developers interested in the program. NVCOG will continue to produce publicly accessible brownfield reports and maintain a public brownfield inventory. Our close working relationship with the Connecticut Brownfield Land Bank, the first land bank of its kind in the state of Connecticut, creates additional capacity for marketing to municipalities and developers.

Year after year, we find our Revolving Loan Fund program is in need of supplementary funding. NVCOG staff are dedicated to working with eligible private developers, municipalities, and non-profits with well-developed project proposals backed by sound financial information and a demonstrated commitment to the program and its requirements. We have three projects requesting funding with immediate need that meet this criteria. One project is located in the target area and the other two are located in distressed municipalities within the Regional Brownfields Partnership.

<b>RLF REQUESTS FLAGGED FOR IMMEDIATE CONSIDERATION</b>					
<b>Location</b>	<b>Size (ac)</b>	<b>Owner</b>	<b>Former Use</b>	<b>Amount Requested</b>	<b>Proposed Reuse</b>
<b>Bristol 273 Riverside Avenue (Sessions Property)</b>	14.87	Private	Industrial	\$800k loan	Market-rate and workforce housing
<b>Waterbury 698 South Main Street (Anamet Property)</b>	17.46	City of Waterbury	Metals Manufacturing	\$200k grant	Mixed-use redevelopment with greenway
<b>Ansonia 420 Main Street</b>	1.6	420 Main Street LLC	Industrial - Storage	\$200k loan	3 buildings with 18,000 square feet commercial

NVCOG has additionally received RLF funding requests and continues to provide support to the emerging projects listed below.

<b>EMERGING RLF REQUESTS</b>				
<b>Location</b>	<b>Size (acres)</b>	<b>Owner</b>	<b>Former Use</b>	<b>Description</b>
<b>Waterbury Lot 10, 835 South Main Street, and 272 River Street</b>	4.5	City of Waterbury	Industrial	Development of regional food hub and urban farm in progress
<b>Waterbury 2100 South Main Street</b>	3.38	City of Waterbury	Industrial	Site of massive 2016 factory fire. Site investigation in progress.
<b>Waterbury 116 Bank Street</b>	.55	Howland Hughes Co. Inc	Historic Department Store	Bid for mixed-use complex including dining, retail, and office space.

<b>Cheshire 493 West Main Street (Cheshire Ball &amp; Socket)</b>	2.5	Ball & Socket Arts Inc	Industrial	Planned entertainment complex with artist studios, galleries, performance space, dining, and educational spaces
<b>Torrington 100 Franklin Street</b>	1.4	City of Torrington	Industrial	Bid for hospitality complex
<b>Newtown 7-9 Glen Road</b>	1.12	Town of Newtown	Gas & Auto-repair	Ideal for river access, public park and Sandy Hook Village parking lot

**b. Task Descriptions and Budget Table**

The tasks to implement the project at hazardous and petroleum sites below:

**Task 1 - Cooperative Agreement Oversight:** Preparation of the required reporting is included under “Personnel”. Travel includes expenses for at least two representatives to attend the next national Brownfields conference. There is an allowance for travel costs at \$.53 per mile for staff to monitor site conditions and attend outreach meetings. Staff will track all reports developed and will measure progress by reporting outcomes quarterly.

Outputs: Quarterly Reports, Community Relations Plans, MBE/WBE Reports, ACRES Entries

**Task 2 – Community Involvement:** NVCOG staff will continue to work with Neighborhood Housing Services of Greater Waterbury, the CT Brownfield Land Bank, and Regional Brownfields Partnership municipal and community members to arrange public meetings, share information, and process project applications. NVCOG will work with community organizations and municipal agencies to identify eligible projects based on established priorities including developer interest, tax delinquency, health risks, smart growth principles, and sustainable development.

Outputs: Minutes from meetings of the Regional Brownfields Partnership; applications to the NVCOG Revolving Loan Fund, Newspaper Ads, Community notices, and marketing materials

**Task 3 – Make Loans:** Staff will arrange meetings of the NVCOG Revolving Loan Fund Committee as applications and requests are received. Staff will coordinate closely with our partner bank and Counsel to ensure loans and loan requests are managed appropriately in a timely fashion.

Outputs: Commercial Notes and Loan Agreements, Subaward agreements, Minutes of the Revolving Loan Fund Committee, Legal Counsel and Opinion, Bank opinion, property appraisals

**Task 4 – Oversee Site Cleanups:** NVCOG Staff will collaborate closely with the developer, the Licensed Environmental Professional, construction and remediation contractors, the state Department of Energy and Environmental Protection, and our EPA project officer to ensure remediation projects at minimum meet EPA requirements and additionally contribute to local jobs initiatives, sustainable construction practices, and mutual community benefit.

Outputs: Request for Proposals for Licensed Environmental Professionals to manage site activities, competitive bids for remediation contractors, Quality Assurance Project Plans, Analyses of Brownfield Clean-up Alternatives, communications with state Department of Environmental Protection, Final Verification Reports, Davis Bacon interview reports

i. Budget Table

Funding Type	Budget Categories	Project Tasks				Total
		Task 1	Task 2	Task 3	Task 4	
Hazardous Substance Funds (HS)	Personnel	5,000	10,000	15,000	10,000	40,000
	Fringe Benefits	2,175	4,400	6,525	4,400	17,500
	Travel	2,000	250	-	250	2,500
	Equipment	-	-	-	-	-
	Supplies	500	-	-	-	500
	Contractual	-	500	4,000	-	4,500
	Loans*	-	-	435,000	-	435,000
	Subgrants	-	-	-	-	-
	Other	-	-	-	-	-
	<b>Subtotal</b>	9,675	15,150	460,525	14,650	500,000
Petroleum Funds (P)	Personnel	5,000	10,000	15,000	10,000	40,000
	Fringe Benefits	2,175	4,400	6,525	4,400	17,500
	Travel	2,000	250	-	250	2,500
	Equipment	-	-	-	-	-
	Supplies	500	-	-	-	500
	Contractual	-	500	4,000	-	4,500
	Loans*	-	-	435,000	-	435,000
	Subgrants	-	-	-	-	-
	Other	-	-	-	-	-
	<b>Subtotal</b>	9,675	15,150	460,525	14,650	500,000
<b>Federal Funding Subtotal</b>						1,000,000
<b>Cost Share</b>						200,000
<b>Total Budget</b>						1,200,000

\*Final grant and loan allocation to be determined by NVCOG RLF Committee upon award.

c. **Ability to Leverage (5 points – ¾ page)**

Due to the large funding needs of the majority sites in our region, NVCOG works closely with member municipalities and non-profits to identify funding from multiple sources including the state Department of Economic and Community Development, the state Department of Energy and

Environmental Protection, the Housatonic Natural Resources Council, developers, CDBG, the Department of Defense, state historic grants, and local match funding. The NVCOG has consistently been able to leverage local, state, and private funding for remediation sites in its current Revolving Loan Fund. In the last ten years, NVCOG has helped secure over \$70,000,000 in additional non-EPA funding on EPA funded sites, both assessment and remediation.

<b>PROPOSED COST SHARE</b>	Private Funding Pending (Ansonia 420 Main Street)	Remediation, Construction and Redevelopment
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Source	Purpose/Role	Amount (\$)	Status
Private Funding (Ansonia 420 Main Street)	Additional Remediation & Redevelopment	>\$1,200,000	Pending
Private Funding (Bristol 273 Riverside)	Redevelopment and Renovation	>\$500,000	Pending

### 3. **COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### a. Engaging the Community

NVCOG staff will continue to strengthen the outreach and community involvement plan that has grown and adapted effectively for over 20 years. NVCOG hosts the Regional Brownfield Partnership with a diverse membership of municipalities, community organizations, and business groups from across the region. Our team will continue to meet residents and stakeholders where they are to identify priorities and share information during grant planning and implementation.

Strategy	Description	Frequency
NVCOG Municipal Meetings	Meetings with municipal leaders and economic development professionals to communicate project progress and develop next step strategies	Estimated 6 per remediation project
Regional Brownfields Partnership Public Outreach Meetings	Public outreach meetings will occur across the region to define community needs and to communicate project work plans	Annual meeting in tandem with smaller, local meetings arranged with municipal staff and chief elected officials, Kickoff and progress meetings in each target community
Website, Social Media, ACRES	All project progress will be updated on ACRES, our website and social media. Public project data will be made available online.	Throughout active project life through reuse/redevelopment Weekly postings at minimum

We will build on the momentum of previous Regional Brownfields Partnership meetings by holding a meeting in the neighborhood of each remediation project prior to initiation as required. We will draft summaries of the project remediation plans and post all required documentation to NVCOG's website. Meetings will be advertised in both English and Spanish. Sign language interpretation and translation services will be made available. We have found mid-morning and early evening meetings are well attended. When employed previously, we have had as many as 50 people attend project meetings with extensive dialogue among professionals, local legislators, state and local health officials, and residents, all supported by translators.

**b. Partnerships with Government Agencies**

NVCOG has worked closely with the Connecticut Department of Energy and Environmental Protection (DEEP) for years on dozens of projects. Connecticut has a privatized system under which Licensed Environmental Professionals may conduct assessments and cleanups. DEEP is notified of every assessment project. DEEP and EPA staff have attended site walks, tours, and community outreach meetings. We will continue our working relationship with DEEP staff.

NVCOG staff work closely with elected officials and community leaders in all 27 municipalities. Similar efforts, which have resulted in \$2,372,000 of active funding, will be put forth on behalf of the targeted areas. We will continue working with our EPA project officer and EPA staff to ensure all projects are carried out appropriately. NVCOG is also working with federal funds on DOT projects to improve infrastructure. NVCOG will continue to work with these partners to ensure they have a funding role wherever possible in the targeted areas. In addition, the Connecticut Department of Public Health has conducted special sessions on or near sites regarding the health effects of assessment findings and the improvements resulting from remediation.

**c. Partnerships with Community Organizations**

**i. Community Organization Description & Roles**

NVCOG reaches out to local organizations when a project is proposed for their area. It will continue to utilize the **Regional Brownfield Partnership** to conduct outreach with its diverse membership of environmental associations, municipal leaders, community members, and business groups. For the target area, NVCOG has additional partners including:

**Connecticut Brownfield Land Bank, Inc.** is a 501-c-3 whose primary purpose is the education of government officials, community leaders, economic development agencies and non-profit organizations on best practices of redeveloping brownfield sites. The land bank is a useful tool for municipalities unable to take on the liability associated with brownfield sites. The Land Bank will help identify potential financial resources and overcome process barriers.

**Neighborhood Housing Services of Greater Waterbury** is a trusted and growing community organization committed to maintaining and developing affordable housing within the greater Waterbury area. Neighborhood Housing Services staff will offer guidance to NVCOG regarding

brownfield remediation projects with potential for affordable housing and will further serve an advisory role to the Regional Brownfields Partnership Executive Committee.

<b>Partner</b>	<b>Role: Charge to achieve benefits</b>
Regional Brownfields Partnership	Provide continuous guidance regarding site selection, identification of potential RLF candidates, and coordination of public outreach
CT Brownfield Land Bank	Links to prospective developers, leveraged funding, outreach
Neighborhood Housing Services of Greater Waterbury	Serve an advisory role to the NVCOG Revolving Loan Fund Committee in order to identify significant potential housing and community development projects in need of remediation funding

ii. Letters of Commitment:

Three letters of Commitment from the aforementioned organizations are attached.

d. **Partnerships with Workforce Development Programs**

The WorkPlace is one of the workforce development boards present in our region. It administers workforce development funds and coordinates providers of job training and education programs. The WorkPlace has operated several EPA Brownfields Training grants, placing graduates into employment with companies in many of the Regional Brownfields Partnership towns. The Workplace continues to support our efforts to put together redevelopment packages where employment assistance can make a site more attractive. NVCOG will work with the Workplace to identify opportunities for coordination on remediation and redevelopment sites.

4. **PROJECT BENEFITS**

a. **Welfare, Environmental, and Public Health Benefits**

**Welfare Benefits:** If awarded, these funds will directly benefit residents of the areas surrounding the targeted properties. Remediating and redeveloping properties in the urban neighborhoods of Bristol, Ansonia, and Waterbury would alleviate dangerous occupancy of currently vacant buildings and properties. Reducing vacancy incrementally within a neighborhood can increase community cohesion and decrease crime. Crumbling buildings will no longer threaten community safety. Two of the properties flagged for immediate consideration are along the planned Naugatuck River Greenway route and all properties listed benefit from regional bus service. Together with current efforts the Naugatuck Valley is making to improve sidewalks and bus service in the area and to complete the 44 mile long Naugatuck River Greenway, residents within the target area will benefit from more walkable and accessible neighborhoods.

**Environmental Benefits:** All streams in the Naugatuck Valley lead to the Naugatuck River, which flows to Long Island Sound. Remediation of the properties in Waterbury and Ansonia will consequently improve water quality both within and beyond our immediate target areas. We will



improve air quality by addressing metal and friable asbestos contamination and we will remove the constant threat to surface water quality by addressing oils in pits and tanks. Where appropriate, contamination will be isolated through capping and infill development. Remediating brownfields will help the region to continue its conservation efforts, protecting open space while encouraging more efficient land-use patterns that make the most of our energy and transportation infrastructure.

**Public Health Benefits:** Residents of the neighborhoods surrounding currently abandoned industrial structures are concerned about the health risks associated with proximity to these structures, especially in light of the two great Waterbury factory fires that destroyed massive buildings in 2015 and 2016. These concerns are shared by the NVCOG. The only way the NVCOG can improve health outcomes is to address the issues incrementally with the resources we have. The RLF is one such critical resource. Remediating sources of contamination both large and small and improving water quality will contribute to decreased risk of asthma and cancer rates over time. Filling long vacant structures will contribute to decreased risk of depression in the communities that are affected most. Building affordable housing and new job centers will provide safe and healthy places for people to live and work to those that need it most, free of asbestos and lead contamination. We believe in the power of the RLF program to aid this cause.

**Sustainable and Equitable Development:** Sustainable and equitable development is a challenge, one that the NVCOG is prepared to meet through common sense solutions and low-cost alternatives. We approach each application to our EPA RLF fund as a team with the intent of bettering the project through incorporation of sidewalk improvements, trail construction, bioretention facilities, passive design strategies and workforce housing where possible. Through our Civil Rights Coordinator and public outreach, NVCOG works to mitigate any negative impacts a remediation or construction project might have on low-income and minority residents.

#### **b. Economic and Community Benefits**

Completion of the projects flagged for immediate consideration would create jobs, build homes, and improve each neighborhood's local economy while strengthening the region as a whole.

**Target Area (Waterbury Neighborhoods):** The remediation and redevelopment of the Anamet site would be a landmark project for the South End neighborhood. The sprawling industrial campus has blighted the area for decades, inviting dangerous activity to its edges and bringing down the otherwise vibrant and wholesome efforts of area residents to fill their community with productive spaces. Completing the Naugatuck River Greenway path along the Naugatuck River on this site would open the South End to new possibilities, reconnecting the area to the water and creating a tremendous asset for area businesses and residents alike.

**City of Bristol:** Bristol is afflicted by many of the same challenges as the Waterbury target area. Low-incomes within a post-industrial context have led to economic stagnation and underemployment. Building a mixed market-rate and workforce housing complex would create homes for people looking to live in an accessible areas in close proximity to the cities of New

Britain, Waterbury, and Hartford. The complex is within walking distance to CTFAstrak, a bus rapid transit line that provides service to these cities through Bristol. In addition to increasing housing diversity within the region, the complex would restore a long overlooked area. The project could very well catalyze further building rehabs in the area.

**City of Ansonia:** The commercial redevelopment planned at Ansonia is estimated to create more than 55 full-time jobs, in addition to those created by remediation and construction. Expected investment is estimated at over \$1.5 million. The project will complete a section of greenway.

**Regional Benefits:** The planned Naugatuck River Greenway trail intersects many brownfield sites. The Greenway will shape the region's future identity. Building on grassroots efforts to clean the Naugatuck River, the Naugatuck River Greenway Steering Committee hosted by NVCOG has seen partial completion of trails in nearly all of the eleven participating communities. The 2015 Economic Impact Study completed by NVCOG in cooperation with the Connecticut Center for Economic Analysis at the University of Connecticut (UConn) estimates that the trail will see more than 2.6 million annual visitors, spur 42.6 million in annual spending, create more than 2,800 new jobs, and result in cumulative health benefits valued at nearly \$260 million for the region.

## **PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **c. Audit Findings**

NVCOG and the former FY 2005 Revolving Loan Fund organization, the Valley Council of Governments (VCOG), have no record of adverse audit findings.

### **d. Programmatic Capability**

NVCOG has a proven track record, the strength of which exists in our ability to leverage existing capacity and capital through close collaboration with the Regional Brownfields Partnership.

**Arthur Bogen**, Environmental Planner with 17 years of experience managing brownfield projects including a revolving loan fund, three supplemental RLF grants, all NVCOG assessment grants, and an American Resource and Recovery Act Cleanup Grant. He is a recipient of the 2008 EPA Environmental Merit Award. Arthur will be the main point of contact for this grant.

**Max Tanguay-Colucci**, Regional Planner, has worked alongside Arthur Bogen for the past 2 and a half years. He is a skilled GIS user, environmental urban designer, planner, and data analyst. Max will be in charge of all community outreach, ACRES updates, issuing RFPs, and maintaining the report library. Max is experienced in federal grant oversight.

**Rick Dunne**, Executive Director for eleven years with background in brownfields, economic development, project management and planning for 26 years. Rick attended multiple EPA brownfield conferences; works closely with municipal and state officials to foster brownfield redevelopment. Rich has management responsibility for all NVCOG brownfield programs

**William Leverence**, Director of Finance, has been trained in federal grant oversight and has successfully improved NVCOG's financial procedures over his last 15 months at the agency.

**Patricia Bauer**, Finance Manager, manages books, invoicing, and funding requests.

**Systems for additional expertise and resources:** Connecticut has an established privatized voluntary assessment and remediation program with technical work overseen by a Licensed Environmental Professional. Subject to EPA approval, NVCOG will issue Requests for Proposals to its previously approved shortlist of firms established by a Request for Qualifications process. NVCOG will continue to work closely DEEP staff and our Project Manager from Region I EPA. Additional resources will continue to be sought from the private, state, and federal programs.

e. **Measuring Environmental Results: Anticipated Outputs/Outcomes**

NVCOG tracks project outputs and outcomes through its own quarterly reporting system developed in-house by staff. Each quarter, NVCOG staff ask Regional Brownfields Partnership communities to update specific fields within an interactive map that directly feeds into the NVCOG Brownfield inventory public accessible online. Each update is reviewed then added to ACRES. NVCOG will utilize this method of tracking project outputs and outcomes once an RLF project is complete. Prior to completion, staff monitor project progress regularly and work with municipal staff to track outputs such as community meeting minutes and outcomes such as jobs created, funding leveraged, greenspace created, and contaminants remediated.

f. **Past Performance and Accomplishments**

i. Currently or Has Ever Received an EPA Brownfields Grant

	<b>Grant</b>	<b>Amount</b>	<b>Sites Assessed/Remediated</b>	<b>Status</b>
1	EPA FY 2016 Assessment Grant	\$400,000 (Haz/Pet)	4 active assessment projects in three municipalities.	Ongoing
2	EPA FY 2012 Assessment Grant	\$400,000 (Haz/Pet)	11 sites assessed. 6 Phase I, 6 Phase II, and 3 Hazardous Materials Surveys.	All funds expended, grant closed
3	EPA FY 2005 Revolving Loan Fund	\$2.6million	8 grants. 5 loans. 5 remediation projects complete. 10+ acres.	All funds obligated

The NVCOG has helped leverage in local, state, private, and other federal sources over \$70,000,000 with EPA assessment and revolving loan fund grants in the last ten years. We have completed significant community projects such as the Police Activity League field, courts, and river daylighting project in Waterbury's North End and job creating projects like the recent \$2.5million Road Ready Used Cars remediation and redevelopment project in Ansonia.

NVCOG has fully obligated its FY 2005 Revolving Loan Fund after receiving 3 supplemental funding grants. We are well on our way to implementing our \$400,000 assessment grant.



**Gary B. O'Connor**  
90 State House Square  
Hartford, CT 06103-3702  
p 860 424 4366  
f 860 424 4370  
goconnor@pullcom.com  
www.pullcom.com

November 16, 2017

Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, Third Floor  
Waterbury, CT 06702

Re: EPA Brownfield Revolving Loan Fund Grants

Mr. Dunne:

We serve as general counsel for Naugatuck Valley Council of Governments ("NVCOG") and have been asked to offer our opinion in connection with its proposal for an award under EPA's Brownfield Revolving Loan Fund Grants program ("RLF"). Specifically, we have been asked to offer our opinion as to (1) NVCOG's legal authority to access and secure sites in the event of an emergency or default of a loan agreement or non-performance under a subgrant; and (2) NVCOG's legal authority to perform the actions necessary to manage a revolving loan fund.

In connection therewith, we have examined a letter from Rick Dunne, Executive Director of NVCOG, dated November 16, 2017 (the "Letter") regarding the default and remedies provisions contained in NVCOG's current loan and grant documents, together with supporting exhibits. In addition, we have also examined the state law and such other materials as we have deemed necessary in order to render this opinion.

In making such examinations we have assumed the genuineness of all signatures, the authenticity of all documents submitted to us, the validity of all applicable statutes, ordinances, rules and regulations and the capacity of all persons executing documents.. As to questions of fact material to our opinion, we have relied upon representations of NVCOG contained in the Letter received from NVCOG in connection with the above transaction, without undertaking to verify the same by independent investigation.

Based upon the foregoing, it is our opinion that:

1. The Lessee is a public body corporate and politic, organized and existing under the laws of the State of Connecticut, and is a political subdivision of the State of Connecticut.

2. NVCOG has legal authority to access and secure sites in the event of an emergency or default of an RLF loan agreement or non-performance under a subgrant; and

3. NVCOG has the legal authority to perform the actions necessary to manage a revolving loan fund, including the ability to hold funds, make loans, enter into loan agreements, and collect repayments.

We base our opinion as to Opinion #2 on the official Opinion of Attorney General Richard Blumenthal, dated April 5, 2000, in which the Attorney General opines that a regional council of governments is a political subdivision of the State. We also base our opinion on the access rights provided to municipalities and other political subdivisions of the State under C.G.S. 22a-133dd. Moreover, NVGOG is comprised of its member municipalities, who under state statutes have the authority to enter properties to: (a) prohibit and abate within the municipality all nuisances and causes thereof, and all things detrimental to the health, morals, safety, convenience and welfare of its inhabitants (C.G.S. 7-148(c)(7)(E)); (b) provide for the health of the inhabitants of the municipality and do all things necessary or desirable to secure and promote the public health and make and enforce police, sanitary or other similar regulations and protect or promote the peace, safety, good government and welfare of the municipality and its inhabitants (C.G.S. 7-148(c)(7)(H)); and (c) provide for the protection and improvement of the environment including, but not limited to, coastal areas, wetlands and areas adjacent to waterways in a manner not inconsistent with the general statutes (C.G.S. 7-148(c)(8)(A)). Finally, we base our opinion on the access rights conferred in the current loan documents of NVCOG as certified in the Letter. NVCOG has indicated to us that it will include in all future loan and subgrant documents similar default and remedy provisions (particularly access rights) similar to those contained in its current loan documents.

We base our opinion as to Opinion #3 on the official Opinion of Attorney General Richard Blumenthal, dated April 5, 2000, in which the Attorney General opines that a regional council of governments is a political subdivision of the State and is eligible to receive brownfield funding from EPA and on the enabling statutes relating to regional council of governments, specifically C.G.S. 4-124p and C.G.S. 8-31b, which authorize such entities to receive funds from federal, state and local governments and to contract with anyone to promote the purposes of such entity, which includes the clean-up of the environment.

We do not express, or purport to express, any opinion with respect to the laws, rules and regulations of any jurisdiction other than (i) the laws, rules and regulations of the State of Connecticut and (ii) the laws, rules and regulations of the United States of America (but as to both clauses (i) and (ii), including only those laws, rules and regulations which, in our experience, are normally applicable to transactions of the type provided for herein.

Page 3

This opinion is given as of the date hereof and we assume no obligation to update or supplement this opinion to reflect any facts of circumstances that may hereafter come to our attention or any changes in law that may hereafter occur.

Very truly yours,

PULLMAN & COMLEY, LLC/GBO

A handwritten signature in cursive script, likely belonging to a lawyer, is positioned below the firm name. The signature is fluid and stylized, with a prominent initial 'P'.



**City of Ansonia**  
OFFICE OF THE MAYOR  
CITY HALL  
253 MAIN STREET  
ANSONIA, CONNECTICUT 06401

**David S. Cassetti**  
*Mayor*

Office: (203) 736-5900  
Fax: (203) 734-3853  
Email: [dcassetti@ansoniact.org](mailto:dcassetti@ansoniact.org)

Mayor David Cassetti  
City of Ansonia  
253 Main Street  
Ansonia, CT 06401

Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, Third Floor  
Waterbury, CT 06702

Re: NVCOG Revolving Loan Fund Request – Ansonia 420 Main Street  
Dear Mr. Rick Dunne,

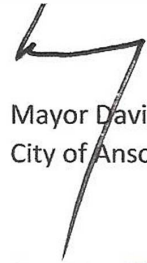
The City of Ansonia has been working closely with the Naugatuck Valley Council of Governments and with Eclipse Development Group LLC, the planned developer for the property. Eclipse Development Group has expressed interest in a short term \$200,000 Revolving Loan Fund loan in order to partially fund remediation once assessment is complete.

We understand NVCOG is currently submitting an application to EPA's FY 2018 Revolving Loan Fund program. A new revolving loan fund with the potential for this loan could not come at a better time for our city.

To date, Eclipse Development Group LLC has committed to building two new commercial spaces on the property. Assessment and remediation will contribute to improved water quality along the adjacent Naugatuck River. Additionally, a portion of the Ansonia Naugatuck River Greenway trail will be incorporated into the new development. This connection to Ansonia's existing greenway trail will bring the region closer to completing the planned 44 mile long paved multi-modal trail.

We are committed to pursuing this loan request to the fullest extent possible for the consideration of the NVCOG Revolving Loan Fund Committee.

Sincerely,

A handwritten signature in black ink, appearing to be 'DC', with a long vertical line extending downwards from the bottom of the signature.

Mayor David Cassetti  
City of Ansonia

A handwritten signature in blue ink, appearing to be 'Sheila O'Malley', with a large loop at the end.

Sheila O'Malley, Economic Development Director  
City of Ansonia





November 9, 2017

Mr. Rick Dunne  
Executive Director  
Naugatuck Valley COG  
49 Leavenworth St.  
Waterbury, CT 06702

RE: Request for Assistance

Dear Mr. Dunne:

Our municipal team has been working on the revitalization of the former Sessions Manufacturing site for about a decade. We have engaged the Connecticut Brownfield Land Bank to help create a strategy for reuse. The Land Bank is coordinating an emerging proposal to redevelop the site as a mix of market rate and workforce housing. However, the \$1,300,000 cost of the remediation and the \$700,000 of back taxes are challenges. Therefore we are requesting a combination of a loan and grant from the Naugatuck Valley Council of Governments Revolving Loan Fund to address the remediation. We realize that the funds are not currently available but ask that this request be considered as part of your new application.

The Sessions site has been underused for several decades. The assessment has been completed. We may have the opportunity to create jobs and taxes where there are none. The City is designated as a "distressed municipality" by the Connecticut Department of Economic and Community Development. We need this assistance.

Thank you for your ongoing brownfield efforts and your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J Malley', is written over the printed name.

Justin Malley  
Executive Director  
Bristol Development Authority



**Regional Brownfields Partnership  
of West Central Connecticut**

c/o Naugatuck Valley Council of Governments  
49 Leavenworth Street, Third Floor, Waterbury, CT 06702 | 203.757.0535 | [nvcogct.org](http://nvcogct.org)

November 14, 2017

Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, Third Floor  
Waterbury, CT 06702

Dear Mr. Rick Dunne,

We are proud to serve the Regional Brownfields Partnership of West Central Connecticut, one of the first regional collaborations to successfully establish and implement EPA funding when federally funded, locally implemented brownfield grant programs first began in the late 1990s. The Regional Brownfields Partnership has come a long way since the 1996 Naugatuck Valley pilot program.

A regional approach has been key to success for EPA programs in our area, allowing cash-strapped municipalities both large and small to access vital remediation and assessment funding. In the past ten years, an EPA investment of just over \$3 million has led to over \$70,000,000 in additional local, state, and private investment. We are committed to maintaining the NVCOG's Revolving Loan Fund program because it works. Since the FY 2005 Revolving Loan Fund is fully committed, it is time NVCOG take up a new program to continue this important work.

We look forward to continuing to work closely with the Naugatuck Valley Council of Governments to provide support, guidance, and expertise on requests for proposals, project selection, and local, state, and federal brownfields policy matters.

Sincerely,

Roy Cavanaugh, Chair  
Town of Watertown, Director of Public Works



11/13/17

Mr. Rick Dunne  
Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth ST  
Waterbury, CT 06702

Dear Rick,

The Land Bank supports the application of the COG for a new RLF. This fund is unique and invaluable. The RLF loan to the developer in our Southington project is critical to the complicated multi-source funding that is bringing this abandoned former industrial site back to tax paying status.

As a 501 c 3 corporation, we are dedicated to reviving the most challenging of our state's brownfield sites. A number of these sites are in the COG service area and in the greater area served by the Regional Brownfield Partnership that you host. We will continue to work closely with you to foster the reuse of these sites. As we have before, we will meet with you, municipal officials and prospective developers to forge transactions made possible by the RLF.

We anticipate a continuing and effective relationship.

Sincerely,

Arthur Bogen, President

41 Eagle Ridge Drive, Essex, CT 06426; [abogen@ctblb.org](mailto:abogen@ctblb.org); 203 444 2023



November 15, 2017

Kevin Taylor, Executive Director  
Neighborhood Housing Services of Greater Waterbury  
161 North Main Street #1  
Waterbury, CT 06702

Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, Third Floor  
Waterbury, CT 06702

Dear Mr. Rick Dunne,

Neighborhood Housing Services of Greater Waterbury serves low to moderate income individuals and families in more than twenty towns in western Connecticut. Many of the people we serve live in the Regional Brownfields Partnership region, including in Torrington, Waterbury, and Naugatuck.

We are aware of the Naugatuck Valley Council of Governments' application to this year's EPA Revolving Loan Fund grant program. It is my understanding this program provides clean-up loans and grants to eligible developers, municipalities, and non-profits. Should the grant be awarded, Neighborhood Housing Services will continue its participation in the Regional Brownfields Partnership and would additionally offer advisory support and guidance to the Revolving Loan Fund Committee on the implementation of the grant.

The United Way estimates that nearly two-thirds of families living in Waterbury are burdened by housing costs well over 30% of their income. Developing brownfield properties is not only critical to making the most of our existing public infrastructure, but it may also be leveraged to increase affordable housing options for all. We are committed to this effort and support the Naugatuck Valley Council of Governments' application to an EPA Revolving Loan Fund.

Sincerely,

Kevin Taylor  
NHSW, Executive Director



Neighborhood Housing Services of Waterbury | 161 North Main St. | Waterbury CT 06702 | P: 203.753.1896 | F: 203.757.6496

## THRESHOLD CRITERIA

**1. Applicant Eligibility:** The Naugatuck Valley Council of Governments is a Regional Council eligible to apply as a “political subdivision of the state” and “general purpose unit of local government” for the purpose of the EPA Brownfields program, pursuant to Connecticut Gen. Stat. 84-24j and B-31a. Attached is a letter from current Senator and that demonstrates eligibility.

**2. Description of Jurisdiction:** The Naugatuck Valley Council of Governments is a regional council providing brownfields services to the 27 municipalities of the Regional Brownfields Partnership. The target community is within the City of Waterbury, the largest city in the Partnership. The 27 municipalities eligible for assessment funding through the Regional Brownfields Partnership include: Ansonia, Beacon Falls, Berlin, Bethlehem, Bristol, Burlington, Cheshire, Derby, Middlebury, Naugatuck, New Britain, Newtown, Oxford, Plainville, Plymouth, Prospect, Seymour, Shelton, Southbury, Southington, Thomaston, Torrington, Waterbury, Watertown, Winchester, Wolcott, and Woodbury.

### **3. Oversight Structure and Legal Authority to Manage a Revolving Loan Fund:**

Please note that you will be required to comply with all applicable federal and state laws and ensure that the cleanup protects human health and the environment.

a. The Naugatuck Valley Council of Governments has two staff that provide oversight to grant. The Regional Planner and Environmental Planner work together to ensure projects are completed in accordance with EPA requirements. Connecticut has a privatized system of licensed environmental professionals responsible for applying to and implement requirements of the state cleanup program. Any RLF recipients will be required to enter into a State of Connecticut cleanup program. These licensed environmental professionals will be engaged by the Naugatuck Valley Council of Governments by a Request for Qualifications / Request for Proposals process or by the developer through competitive bidding.

b. Legal opinion attached (General Counsel Attorney Gary B. O'Connor, Attachment C)

### **4. Statutory Cost Share (See also Section IV.E on Leveraging):**

The Naugatuck Valley Council of Governments will meet the statutory cost share requirement as described in the Narrative Proposal.

<b>PROPOSED COST SHARE</b>	Private Funding Pending (Ansonia 420 Main Street)	Remediation, Construction and Redevelopment
----------------------------	--	--

Congressional Districts Of:

**a. Applicant:** CT-001, CT-003, CT-004, CT-005

**b. Program/Project:** CT-001, CT-003, CT-004, CT-005

**Regional Brownfields Partnership Municipalities Eligible for Funding (2016)**

1. Ansonia
2. Beacon Falls
3. Berlin
4. Bethlehem
5. Bristol
6. Burlington
7. Cheshire
8. Derby
9. Naugatuck
10. New Britain
11. Newtown
12. Oxford
13. Plainville
14. Plymouth
15. Prospect
16. Shelton
17. Southbury
18. Southington
19. Seymour
20. Shelton
21. Thomaston
22. Torrington
23. Winchester
24. Woodbury
25. Wolcott
26. Waterbury
27. Watertown

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

### State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

Naugatuck Valley Council of Governments

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

47-163-0360

\* c. Organizational DUNS:

0796463180000

### d. Address:

\* Street1:

49 Leavenworth Street

Street2:

Third Floor

\* City:

Waterbury

County/Parish:

\* State:

CT: Connecticut

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

06702-2115

### e. Organizational Unit:

Department Name:

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Arthur

Middle Name:

\* Last Name:

Bogen

Suffix:

Title:

Environmental Planner

Organizational Affiliation:

\* Telephone Number:

203.757.0535

Fax Number:

\* Email:

abogen@nvcogct.org



## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

E: Regional Organization

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-08

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS REVOLVING LOAN FUND GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

1234-Brownfields\_RBPEligibleMunicipalities.

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Naugatuck Valley Council of Governments FY 2018 Revolving Loan Fund

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,000,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="200,000.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,200,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed: